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May 13, 2005

Mr. Arthur Neal  
USDA/NOP  
Room 4008 South Building  
1400 and Independence Avenue, SW  
Washington, DC 20250-0001

Dear Mr. Neal:

I am sure you are tired of hearing from me, but I believe the issue too important to allow to keep moving in its current course of direction. You have, I know, received letters from other people on this issue and I ask that you, Mr. Riddle, the NOP and NOSB consider changes in this requirement. Attached on the second page are my comments.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Buzz'. The signature is fluid and cursive, with a large, sweeping 'B' and a trailing 'z'.

Spangler Klopp, DVM, Dpl ACPV  
Corporate Veterinarian

Cc: Mr. William Hawks  
Dr. Thomas Myers/USDA-APHIS  
Dr. David Vogt/ USDA-APHIS  
Mr. Chuck Dix/Townsend

**Comment to NOSB****RE: Livestock Committee Recommendation for Pasture Requirements for the  
National Organic Program  
February 1, 2005****Comment is related to Section 2: Temporary Confinement, item b: allowances**

This is a good clause, but there is no mention of who will determine the specifics of " . . . to prevent the spread of disease from an infected animal to other animals" to allow temporary confinement. I suggest this assessment be done by the state veterinarian of the particular state in conjunction with the USDA-APHIS-AVIC (Area Veterinarian in Charge) of that state. These individuals are the animal health experts within their state and region and also have perspective on the national and international scene. I know of no positions better qualified for this assessment. Animal and public health are critical issues that demand such attention.

A clause such as 2b should also be written for regulation 205.239 "*access to outdoors*" which currently defines Livestock Living Conditions for poultry. There is, however, significant overlap between regulation 205.239 and the pasture requirement regulation. Also justification for temporary confinement in 205.239 is ill defined and generally not accepted. Incorporating the 2b clause into 205.239 and the parameters for such action would be a good imitative to further encourage good animal and public health.

An important and overriding issue here is the inconsistency between this pasture requirement for livestock (ruminant livestock only?) and section 205.239 (1), which is used to mandate access to the outdoors for poultry (apparently including all livestock?). An allowance for temporary confinement in 205.239 (1) is necessary not just to keep systems parallel for livestock and poultry, but more importantly because there are numerous contagious diseases of poultry for which confinement is the principle means of control (EX: Avian Influenza AI).

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